

EX PARTE OR LATE FILED
National Association of Regulatory Utility Commissioners
Incorporated

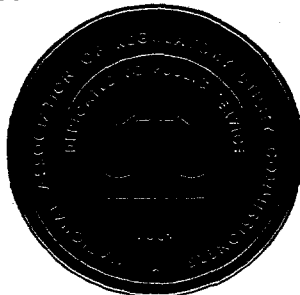
DOCKET FILE COPY ORIGINAL

DENNIS J. NAGEL, *President*
Iowa Utilities Board
Lucas State Office Building
Des Moines, Iowa 50319

KEITH BISSELL, *First Vice President*
Tennessee Public Service Commission
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

ROSE McKINNEY-JAMES, *Second Vice President*
Nevada Public Service Commission
4045 South Spencer Street
Suite A-44
Las Vegas, Nevada 89158-3920

EX PARTE OR LATE FILED



1102 Interstate Commerce Commission Building
Constitution Avenue and Twelfth Street, N.W.
Washington, D. C. 20423

Mailing Address: Post Office Box 684
Washington, D. C. 20044-0684

Telephone: 202-898-2200
Facsimile: 202-898-2213

PAUL RODGERS
Administrative Director
General Counsel

RECEIVED
Treasurer

JUN 15 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 15, 1993

Ms. Donna Searcy, *Secretary*
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: NARUC EX PARTE COMMENTS - Two copies filed in the proceeding titled:

In the Matter of Amendment of the Commissions' Rules to Define Effective Means for Interworking of Customer Premise Equipment and Public Enhanced 9-1-1 Systems.

RM - 8143

Dear Ms. Searcy:

On October 28, 1992, Adcomm Engineering Company filed a Petition for Rulemaking with the Commission. The petition asks for modification of the Commission's rules to establish a common technical approach to caller location identification between Customer Premises Equipment and the network for calls placed to emergency number 9-1-1 in areas with "enhanced" 9-1-1 systems.

On December 29, 1993, in Report No. 1922, the FCC set a cycle for comments on this petition. Unfortunately, the cycle ended before our organization, the National Association of Regulatory Utility Commissioners ("NARUC") could meet and address the issues raised by the petition.

Subsequently, at its March, 1993 meetings, NARUC passed its "Resolution on Private Switch Automatic Location Identification". That resolution notes that:

- o THERE IS A NEED FOR TECHNICAL STANDARDS FOR PS AUTOMATIC LOCATION IDENTIFICATION ("ALI"), and
- o ANY FCC RULES SHOULD PERMIT STATES TO ADOPT ADDITIONAL TECHNICAL STANDARDS AND/OR MORE STRINGENT RULES FOR PS ALI.

NARUC NUCLEAR WASTE PROGRAM
1071 National Press Building, 529 14th Street, N.W., Washington, D.C. 20045
Telephone: (202) 347-4314; Facsimile: (202) 347-4317

No. of Copies rec'd
List ABCDE

4

COMMITTEES OF THE ASSOCIATION FOR THE 1992-1993 YEAR

COMMITTEE ON ADMINISTRATION (1967)

James A. Burg,* South Dakota, *Chair*
 William W. Redman, Jr.,* North Carolina, *Vice Chair*
 James F. Munnelly,* Nebraska
 Eric P. Serna, New Mexico SCC
 James R. Monk, Indiana URC
 Daniel G. Urwiller, Nebraska
 Michael J. Kenney, Connecticut
 Carmen J. Armenti, New Jersey
 Edward J. Robertson, Ontario EB, Observer
 Curt Hebert, Jr., Mississippi

COMMITTEE ON COMMUNICATIONS (1941)

Thomas M. Beard,* Florida, *Chair*
 Dean J. (Joe) Miller, Idaho, *Vice Chair*
 Sharon L. Nelson,* Washington
 Bruce Hagen,* North Dakota
 Lilo K. Schifter, Maryland
 Andrew C. Barrett,* FCC
 Susan M. Knowles,* Alaska
 Louis R. Sherman,* Canadian RTC, Observer
 Preston C. Shannon, Virginia
 Marta Greytok,* Texas PUC
 Dennis J. Nagel,* Iowa UB
 Kenneth Gordon,* Massachusetts
 Robert O. Wells, North Carolina
 Margot Priest, Ontario TSC, Observer
 Stephen O. Hewlett, Tennessee
 Nancy M. Norling,* Delaware
 David W. Rolka, Pennsylvania
 James J. Malachowski, Rhode Island
 Line Rochon, Quebec TB, Observer
 Charles B. Martin, Alabama
 Laska Schoenfelder, South Dakota
 G. Richard Klein, Indiana
 Kenneth McClure,* Missouri PSC
 Howard C. Davenport, District of Columbia
 Jolynn Barry Butler, Ohio
 Norman D. Shumway,* California
 Jean-Marc Demers, Quebec TB, Observer
 Cheryl L. Parrino,* Wisconsin
 Edward H. Salmon, New Jersey
 Lisa Rosenblum, New York PSC

COMMITTEE ON ELECTRICITY (1953)

Ashley C. Brown,* Ohio, *Chair*
 Ronald E. Russell, Michigan, *Vice Chair*
 Robert A. Robertson, Nova Scotia, Observer
 Kenneth D. Stofferahn, South Dakota
 James M. Byrne, Utah
 Patricia S. Qualls,* Arkansas
 Richard D. Casad, Washington
 Vicky A. Bailey,* Indiana
 John H. Arnesen, REA, Observer
 Deborah L. Louison, DOE, Observer
 Otis D. Casto, West Virginia
 Elizabeth Paine, Maine
 Michael A. Pitlock, Nevada
 Kevin Kelly, DOE, Observer
 John T. Coughlin, Wisconsin PSC
 Lynn Shishido-Topel, Illinois
 Patricia M. Eckert, California
 Wendell F. Holland, Pennsylvania
 James T. McFarland, New York PSC
 J.C. Watts, Jr., Oklahoma
 Julius A. Wright, North Carolina

Judith C. Allan, Ontario EB, Observer
 Warren D. Arthur, IV, South Carolina
 Emmitt J. George, Jr., Iowa UB
 Robert Gee, Texas PUC
 Marsha H. Smith, Idaho
 Evan W. Woollacott, Connecticut
 Susan F. Clark, Florida
 James Sullivan, Alabama
 Donald A. Storm, Minnesota PUC

COMMITTEE ON ENERGY CONSERVATION (1984)

Ron Eachus,* Oregon, *Chair*
 Richard H. Cowart,* Vermont, *Vice Chair*
 Allan G. Mueller, Missouri
 Renz D. Jennings,* Arizona
 Cynthia A. Kitlinski, Minnesota PUC
 Carl A. Wolf, Jr., Ontario EB, Observer
 Donald D. Phillips, Delaware
 George E. Overbey, Jr., Kentucky PSC
 Daniel Patrick O'Tierney, Alaska
 Edward M. Meyers, District of Columbia
 William D. Cotter, New York PSC
 Mac Barber, Georgia
 Bob Anderson, Montana
 Steve Ellenbecker, Wyoming
 Mary M. McInerney, New Mexico PSC
 Craig A. Glazer, Ohio
 Allyson K. Duncan, North Carolina
 Leonard U. Wilson, Vermont
 William M. Nugent, Maine
 Christine E.M. Alvarez, Colorado
 Hullihen W. Moore, Virginia
 Douglas L. Patch, New Hampshire
 Scott A. Neitzel, Wisconsin
 Karl A. McDermott, Illinois
 Karl A. Rabago, Texas PUC
 John F. Mendoza, Nevada

COMMITTEE ON FINANCE AND TECHNOLOGY (1985)

Bil Tucker,* Wyoming, *Chair*
 Orville J. Cook, Ontario EB, Observer
 Marcia G. Weeks, Arizona
 Joseph Rhodes, Jr., Pennsylvania
 Ralph Nelson, Idaho
 Sam I. Bratton, Jr., Arkansas
 Edmund R. Skelcher, Ontario TSC, Observer
 Lawrence B. Ingram, New Mexico PSC
 J. Terry Deason, Florida
 Richard M. Fanelly, Ohio
 Mark A. Foster, Alaska
 Stephen C. Hewlett, Utah
 Duncan E. Kincheoe, Missouri
 Suzanne D. Rude, Vermont
 Thomas M. Benedict, Connecticut
 Tom Burton, Minnesota PUC

COMMITTEE ON GAS (1963)

Bruce B. Ellsworth,* New Hampshire, *Chair*
 Ruth K. Kretschmer, Illinois, *Vice Chair*
 Frank O. Heintz, Maryland
 John R. Smyth, Wyoming
 Joshua M. Twilley, Delaware
 Leo M. Reinhold, North Dakota

Roland Priddle, Canada, Observer
 Frederick L. Corban, Indiana
 S. Peter Bickley, New Mexico PSC
 A.J. Pardini, Washington
 Steven M. Fetter,* Michigan
 Nancy Shimanek Boyd, Iowa UB
 Henry G. Yonce,* South Carolina
 Peter Bradford,* New York PSC
 Bob Anthony, Oklahoma
 Julius D. Kearney, Arkansas
 Robert A. Rowan, Georgia
 Jo Ann P. Kelly, Nevada
 C. William W. Darling, Ontario EB, Observer
 Laurence A. Cobb, North Carolina
 Richard D. Frum, West Virginia
 Keith Bissell,* Tennessee
 Joan H. Smith, Oregon
 Barbara Kates-Garnick, Massachusetts
 Walter T. Kelly, Minnesota OPS, Observer
 Patricia D. Perkins, Missouri PSC
 J. Michael Biddison, Ohio
 Rachel C. Lipman, Kansas
 Robert-Paul Chauvelot, Quebec GB, Observer
 Norman E. MacMurchy, Alberta PMC, Observer
 Daniel Wm. Fessler, California

COMMITTEE ON TRANSPORTATION (1983)

Rose McKinney-James,* Nevada, *Chair*
 Claude M. Ligon, Maryland
 Frank D. Cochran, Tennessee
 R. Henry Spalding, Kentucky RC
 William A. Bailey, Kentucky RC
 Stephen T. Walker, Missouri DOT
 Cecil A. Bowers, South Carolina
 Jerome D. Block, New Mexico SCC
 Louis E. Gallegos, New Mexico SCC
 Frank E. Landis, Jr., Nebraska
 Joseph Jacob Simmons, III,* ICC
 Gail C. McDonald, ICC
 Jim Robinson, Kansas

COMMITTEE ON WATER (1967)

Linda Bisson Stevens,* New Hampshire, *Chair*
 David L. Rauch, Missouri, *Vice Chair*
 Paul G. Foran, Illinois
 Dale H. Morgan, Arizona
 Richard G. Patterson, Connecticut
 Charles H. Hughes, North Carolina
 Robert M. Davis, Kentucky PSC
 David E. Ziegner, Indiana
 Jeremiah F. O'Connor, New Jersey
 Lila M. Sapinsley, Rhode Island
 Henry G. Williams, New York PSC
 Jan Cook, Alabama
 Mary Clark Webster, Massachusetts
 Luis Julian Lauredo, Florida
 Galen D. Denio, Nevada
 Thomas M. Dorman, Kentucky PSC
 David S. Williams, Illinois
 Betty Easley, Florida

*Member of the Executive Committee of the Association

**Ms. Donna Searcy, Secretary
Federal Communications Commission
NARUC'S JUNE 15, 1993 WRITTEN EX PARTE PRESENTATION**

Page -2-

Pursuant to 47 C.F.R.1.1206(1), NARUC is submitting, for the record, two copies of this letter. I have also attached a copy of the March 1993 Resolution for your information and review.

There are a few aspects of the resolution that I would like to briefly discuss. Specifically, the March resolution discusses the recent history of enhanced 9-1-1 service, noting the recent instances where emergency vehicles have been dispatched to the main location of a private switch rather than to the location of the person needing emergency assistance, causing unnecessary delays and sometimes loss of life.

This instances occur when a calling party dials "9-1-1" from a station behind a private switch, such as a Private Branch Exchange (PBX) or a Shared Tenant Service (STS) arrangement. Under those circumstances, the Automatic Number Identification (ANI) or a combination of ANI and Automatic Location Identification (ALI) information that is sent to the Public Safety Answering Point (PSAP) is that of the main telephone number and address of the private switch, which is not necessarily the telephone number and location from which the call originated.

This is a particular problem with (a) PBXs utilized by school districts that serve an entire district with off-premises extensions, (b) STS arrangements serving apartment complexes where the PBX is in the manager's office, (c) multi-building office parks where the PBX is in a central location, and (d) in a campus environment where the PBX is in the Administration Building.

State Public Utility Commissions have been alerted to these problems and many are working with industry, in conjunction with public safety agencies and private switch owners, to develop a solution to this situation that would assure that a private switch would forward the exact telephone number and location from which a telephone call to "9-1-1" for emergency assistance was made.

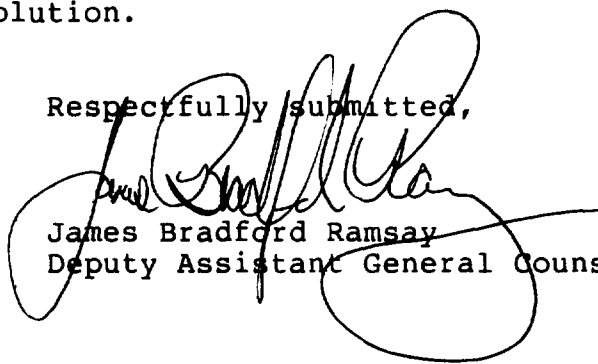
Specifically, the Oregon Public Utility Commission, the Utah Public Service Commission, the Colorado Public Utilities Commission and the Washington Utilities and Transportation Commission, all Commissions active in NARUC, have already approved tariffs to allow

Ms. Donna Searcy, Secretary
Federal Communications Commission
NARUC'S JUNE 15, 1993 WRITTEN EX PARTE PRESENTATION

Page -3-

NARUC respectfully requests that the Commission carefully examine and implement the proposals and requests described in this letter and the attached resolution.

Respectfully submitted,



James Bradford Ramsay
Deputy Assistant General Counsel

Enclosure

cc: Chairman James H. Quello
 Commissioner Andrew C. Barrett
 Commissioner Ervin S. Duggan

Resolution on Private Switch Automatic Location Identification

WHEREAS, there have been numerous examples in recent years where emergency vehicles were dispatched to the main location of a private switch rather than to the location of the person needing the emergency assistance, causing unnecessary delays and sometimes loss of life; and

WHEREAS, when a calling party dials "9-1-1" from a station behind a private switch, such as a Private Branch Exchange (PBX) or a Shared Tenant Service (STS) arrangement, the Automatic Number Identification (ANI) or a combination of ANI and Automatic Location Identification (ALI) information that is sent to the Public Safety Answering Point (PSAP) is that of the main telephone number and address of the private switch, which is not necessarily the telephone number and location from which the call originated; and

WHEREAS, this is a particular problem in the following situations: with PBXs utilized by school districts that serve an entire district with off-premises extensions; with STS arrangements serving apartment complexes where the PBX is in the manager's office; in multi-building office parks where the PBX is in a central location; and in a campus environment where the PBX is in the Administration Building; and

WHEREAS, the telecommunications industry is currently working with public safety agencies and private switch owners to develop a solution to this situation; whereby, a private switch would forward the exact telephone number and location from which a telephone call to "9-1-1" for emergency assistance was made; and

WHEREAS, the Oregon Public Utility Commission, the Utah Public Service Commission, the Colorado Public Utilities Commission and the Washington Utilities and Transportation Commission have already approved tariffs to allow private switch owners to be directly or indirectly connected to PSAPs in order to forward the specific ANI and ALI information from which a telephone call to "9-1-1" was placed; and

WHEREAS, on December 29, 1992, the FCC established a thirty day comment period regarding the request for rulemaking by Adcomm Engineering Company (RM-8143) to amend Part 68 Rules to include technical standards for PS ALI; therefore, be it

RESOLVED, by the National Association of Regulatory Utility Commissioners (NARUC), assembled at its Winter Meetings in Washington, D.C., that NARUC believes that there is a need for technical standards for PS ALI; and be it further

RESOLVED, that the NARUC supports FCC Rules to permit states to adopt additional technical standards and/or more stringent rules for PS ALI; and be it further

RESOLVED, that the NARUC General Counsel will enter comments concerning NARUC's position regarding the need to amend Part 68 for technical standards for PS ALI in RM-8143 with the FCC and will distribute this resolution for consideration.